



Direct Dial
(810) 424-3002

July 10, 2006

Via Email

Financial Crimes Enforcement Network
P.O. Box 39
Vienna, VA 22183

Re: Provision of Banking Services to MSBs
RIN 1506-AA85
71 Federal Register 12308 (March 10, 2006) and
71 Federal Register 27980 (May 15, 2006)

To the Staff of the Regulatory Policy and Programs Division:

Citizens Bank files this letter in response to the solicitation of comments published in an advance notice of rulemaking by the Financial Crimes enforcement Network (FinCEN). Citizens Bank appreciates the opportunity to participate in this process, and recognizes the importance of providing banking services to NBFIs and MSBs.

Citizens Bank has chosen to continue to provide banking services to Money Services Businesses (MSBs) as well as Non-Bank Financial Institutions (NBFIs) that perform those services, but are not required to register as MSBs. We struggle with the many requirements that are placed on us as a provider of these services and recommend that the following issues be considered when making revisions to FinCEN requirements for providing banking services to MSBs:

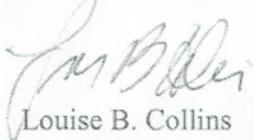
1. Remove the onus requirements that continue to make banks the de facto regulators of MSBs and NBFIs, these requirements include:
 - o Monitoring and evaluating the activities of cash-intensive businesses to determine if they are NBFIs;
 - o Determining which NBFIs are required to be registered with FinCEN;
 - o Monitoring licensing and registration renewals.
2. Remove the requirements that relate to evaluating and monitoring an MSB's compliance with BSA;
3. Decriminalize the compliance obligations of banks that serve their communities' MSBs in good faith;

4. Communicate registration and BSA compliance requirements to NBFIs, and place the requirement on them to determine whether they are required to be registered. This could be accomplished by identifying possible NBFIs through NAICS codes and distributing information packets to companies identified as probable NBFIs. This is one of the ways we use to discover NBFIs.

Furthermore, we are unable to effectively use the FinCEN lists because they are unreliable (companies are listed as registered MSBs when in fact they are agents of MSBs, while companies that actually are registered are omitted from the list) and because the lists are not easily searchable to determine if a customer is listed. If the reason for not providing EINs is for privacy purposes, restrict the access to that detail to specified entities. While awaiting production of copies of registration documents, banks need a reliable and effective means to determine whether our customers are registered.

These comments are provided in the hope that Citizens Bank will be able to continue to provide deposit services to NBFIs and MSBs.

Very truly yours,



Louise B. Collins
Assistant General Counsel